

REMARKS / ARGUMENTS

Figure 1 and the specification have been amended to correct for duplicate use of the reference number "142" for two different elements in the drawings.

The new grounds of rejection combine Isoe, Applicant's admitted prior art (AAPA) and Rinaldi, along with notice provided by the Examiner at page 5 of the office action "that a received signal can be converted, reconverted into multiple respective color formats, . . .". However, it is well-established that "to establish obviousness based on a combination of the elements disclosed in the prior art, there must be some motivation, suggestion or teaching of the desirability of making the specific combination that was made by the applicant." *In re Kotzab*, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1316 (Fed. Cir. 2000), citing *In re Dance*, 160 F.3d 1339, 1343, 48 USPQ2d 1635, 1637 (Fed. Cir. 1998) and *In re Gordon*, 733 F.2d 900, 902, 221 USPQ 1125, 1127 (Fed. Cir. 1984). One cannot establish motivation for combining references through unsupported conclusory statements. *In re Lee*, 277 F.3d 1338, 1343, 61 USPQ2d 1430, 1434 (Fed. Cir. 2002).

Assuming, arguendo, that each of the four sources of information disclose the purported elements, there is no showing that combining these diverse sources of information would have been obvious or even apparent absent the catalyst of the present patent application which caused the references to eventually be discovered only after multiple searches and examinations.

Accordingly, the present claims are in condition for allowance and Applicant respectfully requests reconsideration and that a timely Notice of Allowance be issued in this case. If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 415-279-5098.

Respectfully submitted,

7-2-04
Date



Charles J. Kulas
Reg. No. 35,809 Tel: 415-279-5098

